UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD)(SN) ECF Case

This document relates to:

Bauer et al. v. al Qaeda Islamic Army, et al., 02-cv-7236 (GBD)(SN)

NOTICE OF RULE 60(a) MOTION FOR CORRECTION TO PARTIAL FINAL JUDGMENT

Plaintiff by undersigned counsel moves under Federal Rule of Civil Procedure 60(a) for an order correcting this Court's October 31, 2016 Order of Partial Final Default Judgment on behalf of a certain *Bauer* Plaintiff identified in Exhibit A of ECF No. 3371-1 for reasons stated as follows:

- 1. Plaintiff's counsel conducted extensive quality control before filing its Motion for Partial Final Default Judgment and has continued its quality control process after filing same, during which time it has continued to obtain additional information from clients and family members of clients to complete its files. In so doing, counsel has determined that a certain minor error was contained in the exhibit identifying a certain *Bauer* Plaintiff in the above-referenced matter, specifically a name incorrectly stated.
- 2. Through the instant Motion, Plaintiff seeks to correct the error as this issue may create potential problems for Plaintiff's enforcing and collecting of said judgment. The modification requested herein does not affect the substantive claims or relief sought. No new claims are asserted, and no additional plaintiffs have been added. Moreover, because the change is insubstantial, no additional service on Iran is required.

WHEREFORE, Plaintiff respectfully requests the issuance of the Corrected Order of Partial Final Default Judgment on behalf of a certain *Bauer* Plaintiffs as set forth in Exhibit A to this motion.

Dated: April 29, 2020 Respectfully submitted,

BAUMEISTER & SAMUELS, P.C.

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